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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PENDLETON DIVISION

BALTAZAR DELGADO,

PLAINTIFF,

V.

OREGON DEPARTMENT OF
CORRECTIONS, an agency of the STATE OF
OREGON; SUE WASHBURN, FORMER
SUPERINTENDENT, EOCI; DAVID PEDRO,
FORMER ASSISTANT SUPERINTENDENT
OF SECURITY, EOCI; OFFICER R.
PAGLIARULO; OFFICER T. BROWNELL,
AND LIEUTENANT K. HOGELAND.

DEFENDANTS.

CASE NO. 2:23-cv-00804-MK

PLAINTIFF'S UNOPPOSED MOTION FOR
EXTENSION OF TIME

LR 7-1 CERTIFICATION

Pursuant to Local Rule 7-1, Juan Chavez, counsel for Plaintiff Baltazar Delgado, hereby certifies that he has conferred with Michael Washington, Counsel for the Defendants, via email on March 25, 2025, and Defendants do not oppose this motion.

RELIEF REQUESTED

Plaintiff requests an extension of the discovery deadlines in this matter. Plaintiff requests an additional four months to complete discovery.

MOTION FOR EXTENSION OF TIME

ARGUMENT AND AUTHORITY

Case schedules can be modified and extended based upon a showing of “good cause.” Fed. R. Civ. P. 16(b)(4). Here, there is good cause for an extension of all discovery deadlines by approximately four months. The parties still need to depose involved parties. Counsel for Defendant has multiple upcoming trials to account for when scheduling depositions and completing potential additional discovery requests. Counsel for Plaintiff requests that the deadlines be adjusted as follows:

- The current Close of Discovery is March 31, 2025. We request that the close of discovery be adjusted to July 29, 2025.
- The current Dispositive Motions deadline is April 14, 2025. We request that the deadline be adjusted to August 12, 2025.
- The current date to submit a Joint ADR Report and Pretrial Order is May 12, 2025. We request that the deadline be adjusted to September 9, 2025, if no dispositive motions are filed, or 30 days after resolution of any dispositive motions.

CONCLUSION

Based on the foregoing, Plaintiff requests that this unopposed motion be granted, and that the new deadlines be set.

DATED: March 26, 2025.

/s/Juan C. Chavez
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Attorney for Plaintiff